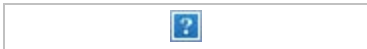


From: [Michael PINTO](#)
To: [Bury, Carolyn](#)
Cc: [Bob WRIGHT](#)
Subject: East Plant Bi-Monthly Report
Date: Tuesday, January 14, 2014 4:29:34 PM
Attachments: [November December 2013.pdf](#)

Carolyn,

Attached is the November/December 2013 Bi-Monthly Progress Report for the Arkema East Plant in Riverview and Wyandotte, MI.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



***** ATTACHMENT NOT DELIVERED *****

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image001.jpg
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into the EPA network. EPA is deleting all computer program attachments
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rename the file extension to its correct name.

For further information, please contact the EPA Call Center at
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

***** ATTACHMENT NOT DELIVERED *****



January 14, 2014

via electronic mail

United States Environmental Protection Agency
Region V
RCRA Enforcement Branch (HRE-8J)
77 Jackson Street
Chicago, IL 60604
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order
Docket No. V-W-89R-45
Arkema Inc.
Riverview, Michigan
MID 005 363114
Progress Report #143

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of November and December 2013. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for January and February 2014 is also included.

I. East Plant Activities Completed in November and December

CMS Task IV

The CMS is currently under review by USEPA.

Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,191,320 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 6,740 gallons of groundwater were extracted and treated during the reporting period. The volume of water treated was lower than typical for a two month period due to the system being down for pump timer procurement and replacement.

Other Activities

During the reporting period LSS, GLNPO, and other non-federal parties executed a GLLA Project Agreement to prepare a design for a Trenton Channel remedial action.

In response to a request from EPA, LSS submitted a quarterly groundwater monitoring plan for Area 17 (Halowax Area). EPA approved the plan.

EPA sent of photo of a leak in a sheetpile wall that was taken by GLNPO while performing sediment sampling in the vicinity of the Halowax Area. It is uncertain if the leak is in the Halowax wall or an adjacent sheet pile wall unrelated to the Halowax Area groundwater containment system. LSS has developed a plan for inspecting the wall by boat during the next seasonal low water period.

II. Corrective Action Activities Anticipated for January and February 2014

CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

Other Activities

Work will continue on the GLLA Trenton Channel project.

Halowax Area monitoring wells will be sampled in accordance with the approved work plan.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto
Principal Environmental Engineer
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing
Mr. Laura Verona- MDNR - Waste Management Div. Livonia